



POTENTIAL HAZARDOUS WASTE SITE IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION VI	SITE NUMBER (to be assigned by HQ) TXD058598947
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NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME Old Standard Industries		B. STREET (or other identifier) 3016 Austin Hwy; (site location map attached)	
C. CITY San Antonio	D. STATE TX	E. ZIP CODE 78218	F. COUNTY NAME Bexar
G. OWNER/OPERATOR (if known) 1. NAME Gill Companies; 615 Soledad, San Antonio, TX 78218		2. TELEPHONE NUMBER 512/222-2434	
H. TYPE OF OWNERSHIP <input type="checkbox"/> 1. FEDERAL <input type="checkbox"/> 2. STATE <input type="checkbox"/> 3. COUNTY <input type="checkbox"/> 4. MUNICIPAL <input checked="" type="checkbox"/> 5. PRIVATE <input type="checkbox"/> 6. UNKNOWN			

I. SITE DESCRIPTION

Former battery reclamation facility

J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.) Jim Clark, San Antonio Metropolitan Health District	K. DATE IDENTIFIED (mo., day, & yr.) 3/1/84
L. PRINCIPAL STATE CONTACT 1. NAME Robert Lee, Enforcement Coordinator Texas Water Commission, Austin, TX	
2. TELEPHONE NUMBER 512/299-8853	

II. PRELIMINARY ASSESSMENT (complete this section last)

A. APPARENT SERIOUSNESS OF PROBLEM <input type="checkbox"/> 1. HIGH <input type="checkbox"/> 2. MEDIUM <input type="checkbox"/> 3. LOW <input checked="" type="checkbox"/> 4. NONE <input type="checkbox"/> 5. UNKNOWN	
B. RECOMMENDATION <input checked="" type="checkbox"/> 1. NO ACTION NEEDED (no hazard) <input type="checkbox"/> 2. IMMEDIATE SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: <input type="checkbox"/> 3. SITE INSPECTION NEEDED a. TENTATIVELY SCHEDULED FOR: b. WILL BE PERFORMED BY: <input type="checkbox"/> 4. SITE INSPECTION NEEDED (low priority)	



C. PREPARER INFORMATION 1. NAME John P. Frerich ICF - FIT		2. TELEPHONE NUMBER 214/744-1641	3. DATE (mo., day, & yr.) 6/26/87
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III. SITE INFORMATION

A. SITE STATUS <input type="checkbox"/> 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.) <input checked="" type="checkbox"/> 2. INACTIVE (Those sites which no longer receive wastes.) <input type="checkbox"/> 3. OTHER (specify): <u>TXD058598947</u> (Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)	
B. IS GENERATOR ON SITE? <input checked="" type="checkbox"/> 1. NO <input type="checkbox"/> 2. YES (specify generator's four-digit SIC Code): <u>SUPERFUND FILE</u>	
C. AREA OF SITE (in acres) 16	D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES 1. LATITUDE (deg.-min.-sec.) 29° 28' 30" N 2. LONGITUDE (deg.-min.-sec.) 98° 24' 12" W
E. ARE THERE BUILDINGS ON THE SITE? <input checked="" type="checkbox"/> 1. NO <input type="checkbox"/> 2. YES (specify): <u>REORGANIZED</u> (previous structures were removed)	

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

<input checked="" type="checkbox"/> A. TRANSPORTER	<input checked="" type="checkbox"/> B. STORER	<input checked="" type="checkbox"/> C. TREATER	<input checked="" type="checkbox"/> D. DISPOSER
1. RAIL	1. PILE	1. FILTRATION	1. LANDFILL
2. SHIP	2. SURFACE IMPOUNDMENT	2. INCINERATION	2. LANDFARM
3. BARGE	3. DRUMS	3. VOLUME REDUCTION	3. OPEN DUMP
4. TRUCK	4. TANK, ABOVE GROUND	4. RECYCLING/RECOVERY	4. SURFACE IMPOUNDMENT
5. PIPELINE	5. TANK, BELOW GROUND	5. CHEM./PHYS. TREATMENT	5. MIDNIGHT DUMPING
6. OTHER (specify):	6. OTHER (specify):	6. BIOLOGICAL TREATMENT	6. INCINERATION
		7. WASTE OIL REPROCESSING	7. UNDERGROUND INJECTION
		8. SOLVENT RECOVERY	8. OTHER (specify):
		9. OTHER (specify):	

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

This site was cleaned up voluntarily by the responsible parties. Prior to the clean up program, this site contained lead contaminated soil, battery cases, lead/dross/slag, flue dust, lead oxide, and dried sludge.

V. WASTE RELATED INFORMATION

A. WASTE TYPE

None presently known

☐ 1. UNKNOWN ☐ 2. LIQUID ☐ 3. SOLID ☐ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☐ 1. UNKNOWN ☐ 2. CORROSIVE ☐ 3. IGNITABLE ☐ 4. RADIOACTIVE ☐ 5. HIGHLY VOLATILE
☐ 6. TOXIC ☐ 7. REACTIVE ☐ 8. INERT ☐ 9. FLAMMABLE
☐ 10. OTHER (specify): Not applicable

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

Yes, all material shipped was accompanied with manifest (see attachments).

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT None	AMOUNT None	AMOUNT None	AMOUNT None	AMOUNT None	AMOUNT None
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
<input checked="" type="checkbox"/> (1) PAINT, PIGMENTS	<input checked="" type="checkbox"/> (1) OILY WASTES	<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS	<input checked="" type="checkbox"/> (1) ACIDS	<input checked="" type="checkbox"/> (1) FLYASH	<input checked="" type="checkbox"/> (1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	(2) OTHER (specify):	(2) NON-HALOGENATED SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER (specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER (specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER (specify):
			(6) CYANIDE	(6) OTHER (specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER (specify):		

V. WASTE RELATED INFORMATION (continued)**3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard):**

None

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

See V.4 on attachment A

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD	X			
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER				
8. CONTAMINATION OF SURFACE WATER				
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR				
12. NOTICEABLE ODORS				
13. CONTAMINATION OF SOIL				
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION				
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS				
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify):				

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

None known

- ☐ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☐ 3. STATE PERMIT (specify): _____
☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER
☐ 7. RCRA STORER ☐ 8. RCRA TREATER ☐ 9. RCRA DISPOSER
☐ 10. OTHER (specify): _____

B. IN COMPLIANCE?

- ☐ 1. YES ☐ 2. NO ☐ 3. UNKNOWN

Not applicable

4. WITH RESPECT TO (list regulation name & number): _____

VIII. PAST REGULATORY ACTIONS

- ☒ A. NONE ☐ B. YES (summarize below)

IX. INSPECTION ACTIVITY (past or on-going)

- ☐ A. NONE ☒ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION
Soil Sampling	1983	City of San Antonio	Jim Clark of San Antonio Metropolitan Health District took initial soil samples.
Post Clean Up Sampling	Feb. 1985	TDWR	Soil sampling was performed to verify clean up.

X. REMEDIAL ACTIVITY (past or on-going)

- ☐ A. NONE ☒ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION
Remedial Action/Clean Up	4/4/84 - 3/10/85	owners	See attachments A, B, And C.

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT SUPPLEMENT SHEET

Instruction - This sheet is provided to give additional information in explanation of a question on the form T2070-2.

Corresponding
number on form
V.4

The Old Standard Industries Site, also known as the Interchange Office Park, is a triangular shaped parcel of land, approximately 16 acres, located in northeastern San Antonio, Texas (see Site Sketch in Attachment B). Standard Industries, a battery reclamation business, was operating on this site from the early 1930's until the late 70's when they moved to a new location in San Antonio.

In early 1984 the Texas Department of Water Resources, (TDWR), notified the present site owners, Gill Companies and Standard Industries, the former owners, that this site was suspected of being contaminated with lead. Sampling confirmed lead contamination and shortly thereafter, the owners implemented a Remedial Action Plan to remove lead contaminated soil from the site (see Attachment B). This plan was carried out from 4/4/84 to 3/10/85. The Remedial Action Plan describes in detail the waste characteristics of the over 53,000 tons of soil and wastes removed from this site.

TDWR representatives performed post clean up sampling at this site in February 1985, to verify that the site was cleaned up to levels which met or exceeded TDWR parameters (see Attachment C). The clean up parameters established by TDWR were:

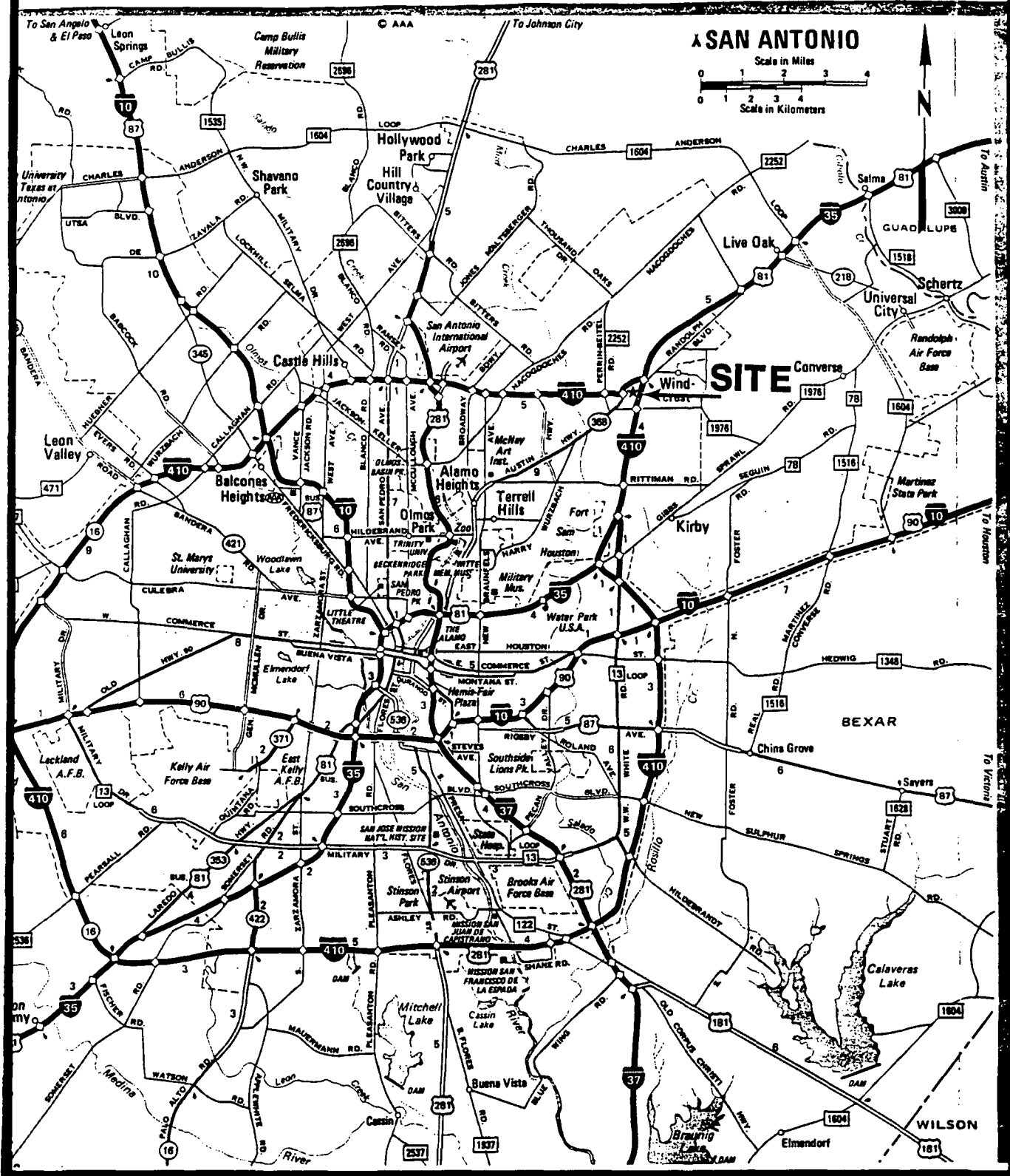
- 1) <0.05 mg/l + or -2 standard deviation lead concentration in leachate, using "TDWR Leachate Method" and
- 2) less than 1000 mg/kg total concentration in the soil within a 90% confidence level.

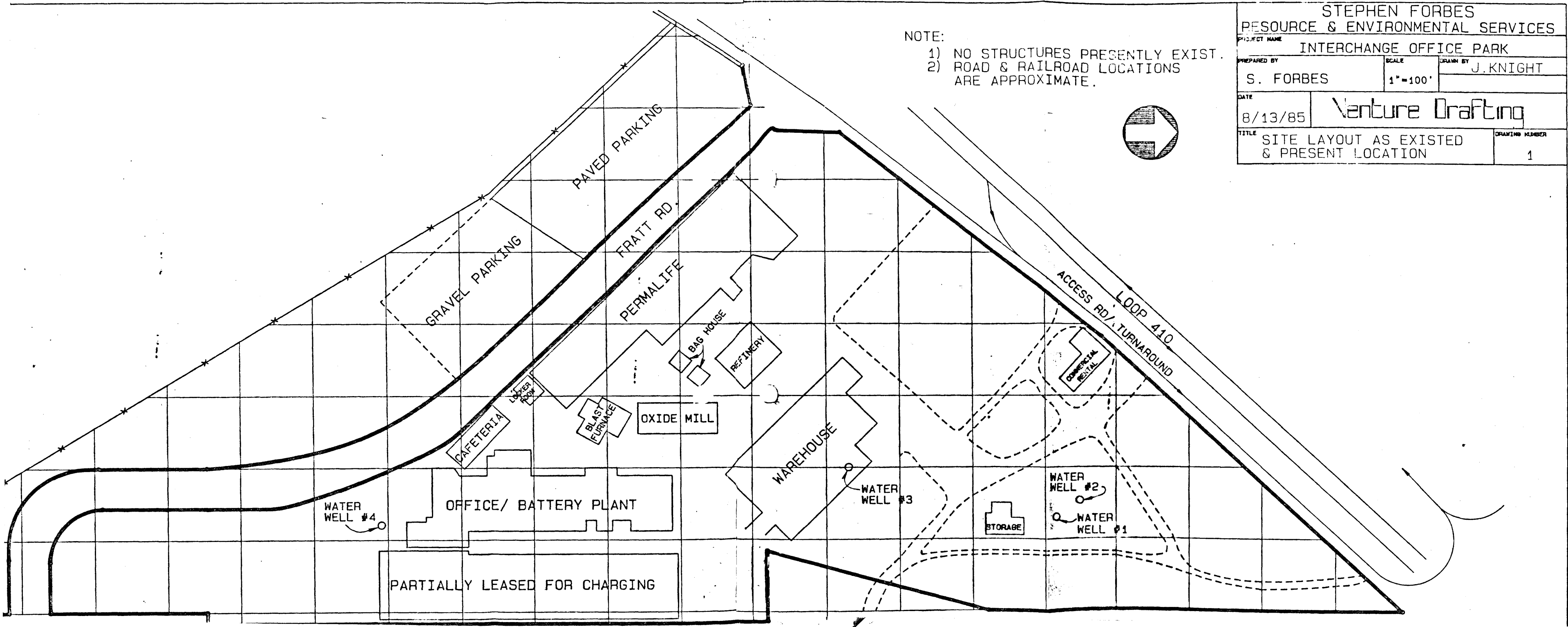
All 94 of the verification soil samples passed the above parameters set by TDWR.

It appears that this site has been cleaned up in close coordination with the TDWR and to their satisfaction. The hazardous materials once present at this site appear to have been properly disposed of. Because the state agency, TDWR, has been actively involved in this remedial action, and the site has been cleaned up to parameters set by the TDWR, FIT recommends that no further action be taken in regards to this site.

The complete file on this site is located at the TDWR central Files and Records Room, P.O. Box 13087, Austin, Texas, 78711, telephone: 512/463-8562. The TDWR registration number for this site is #13087.

SITE LOCATION MAP





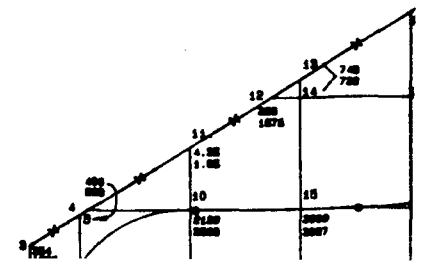
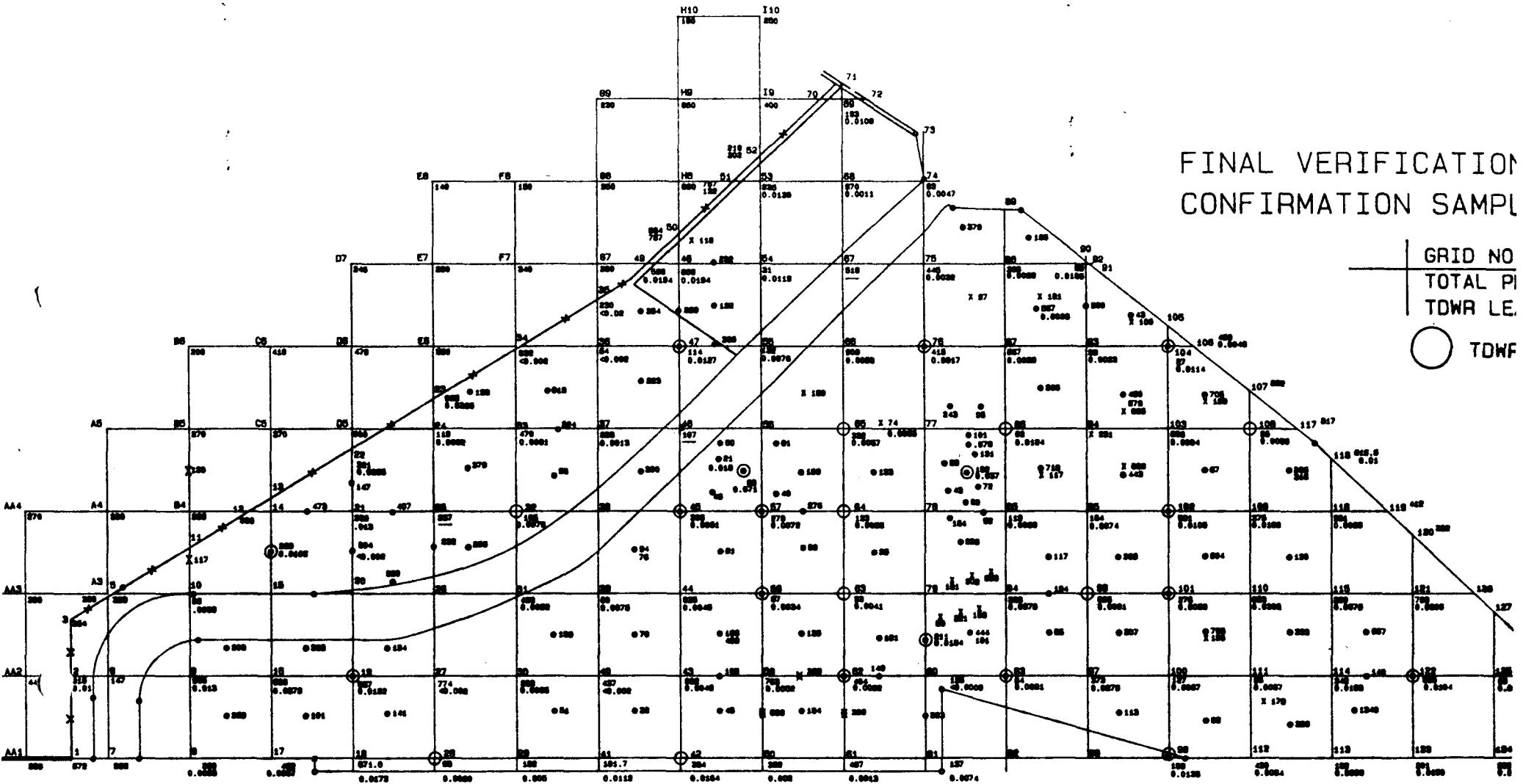
NOTE:
1) NO STRUCTURES PRESENTLY EXIST.
2) ROAD & RAILROAD LOCATIONS ARE APPROXIMATE.

STEPHEN FORBES		
RESOURCE & ENVIRONMENTAL SERVICES		
PROJECT NAME INTERCHANGE OFFICE PARK		
PREPARED BY	SCALE	DRAWN BY
S. FORBES	1"=100'	J. KNIGHT
DATE	Venture Drafting	
8/13/85	TITLE SITE LAYOUT AS EXISTED & PRESENT LOCATION	
		DRAWING NUMBER 1

FINAL VERIFICATION CONFIRMATION SAMPL

GRID NO
TOTAL PI
TOWR LE.

○ TDWF



ATTACHMENT B

1.0 INTRODUCTION

The following report describes the Remedial Action Plan (RAP) implemented at the Interchange Office Park (IOP) site at the intersection of Fratt Road and Austin Highway, San Antonio, Texas, as illustrated in the preceeding aerial photograph.

It is important to be aware that the cleanup of the IOP site was undertaken as a voluntarily effort and not under a formal TDWR enforcement directive; however, the cleanup program was closely coordinated through the TDWR to ensure that the program would meet with state approval.

It is the purpose of this report to describe in detail the design and implementation of the RAP. Its objective is to assure all those interested that the site has been cleaned to acceptable levels - as set by the Texas Department of Water Resources (TDWR) - which will permit full development and use without associated restriction.

The TDWR defined lead concentrations in the soils as the measuring parameter to determine and quantify degree of soil contamination.

The objective of the RAP - as defined jointly by Gill Companies and Standard Industries (SI)-was to remove lead(Pb) contaminated soils to a residual level of concentration which would allow

development without deed restriction, and to minimize long term liability.

Specific cleanup parameters were established by the TDWR. The onsite allowable final Pb concentration levels set by the TDWR were:

- (1) $<0.05 \text{ mg/l} \pm 2$ standard deviation Pb concentration in leachate generated by the procedures referred to as "TDWR Leachate Method" and
- (2) less than 1000 mg/kg total concentration in the soil within a 90% confidence level.

The total cleanup program can be divided into the following phases:

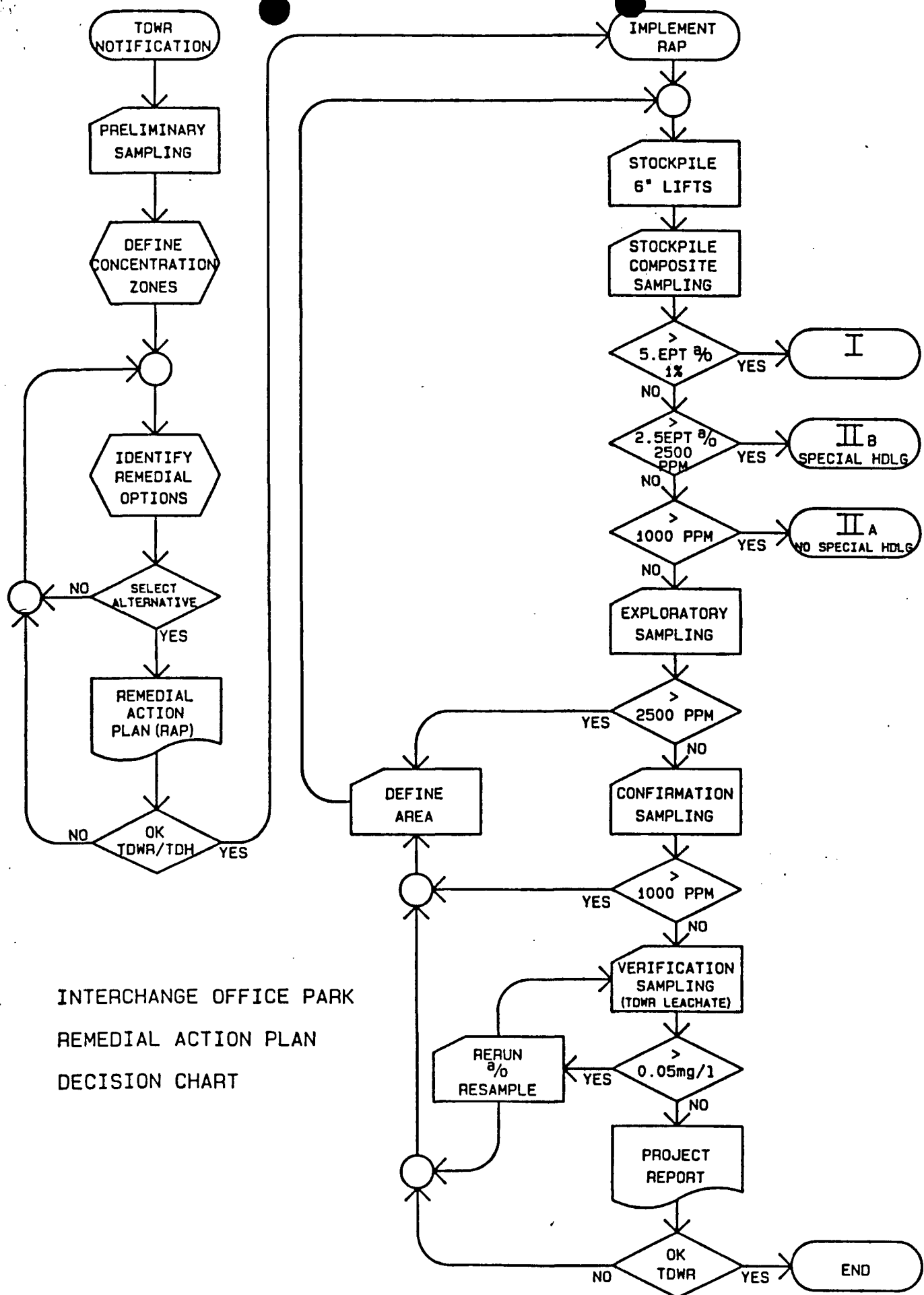
- 1) Delineate potential zones of contamination.
- 2) Identify Class I and Class II material.
- 3) Remove Class I material to secure commercial hazardous waste landfill.
- 4) Remove Class II soils to Texas Department of Health (TDH) approved local landfill.
- 5) Confirm Class I and Class II materials removed.
- 6) Verify that in situ soils after removal of contaminated soils met TDWR allowable levels.

The project decision flowchart is presented in figure 1.

This report will follow the flow chart and the respective sample results will be found in their appropriate section.

2.0 EXECUTIVE SUMMARY

To complete the project from initial identification as a potential hazardous waste site to final decontamination took just



under one year (4/4/84 to 3/10/85). The cleanup itself occurred over a period from 9/24/84 through 5/6/85 with 75 actual haul days. Table X presents the daily shipping schedule. The downtime was lost to inclement weather either at the site itself and/or one or both of the disposal facilities. - including a record breaking snowstorm. (See Photo Essay Plates 24 & 25)

To meet the goals of the RAP over 300 initial exploratory samples were collected to delineate zones of contamination. During the course of the actual cleanup an additional 600 samples were collected and analyzed. Overall, over 1000 samples were collected and analyzed.

The initial projection for the volume of soil to be removed assumed an average depth of 6-8". The volume and depth were based on preliminary sampling results and historical information gathered from SI. The initial projections were:

Class I	17,139 Tons
Class II	14,113 Tons

Actual tonnage removed was:

Class I	37,222 Tons
Class II	17,494 Tons

Actual depth ranged from 3" to five feet with 29% of surface area taken to depths of 3"-6"; 19% taken to depths of 7"-12"; 21% excavated from 1 foot to 5 feet. Thirty-one percent of site surface did not require removal of soils.

Figure 2 compares the initial surface concentrations before removal to the final surface concentrations after all Class I & II soils were shipped offsite. Upper values at each grid point indicate total lead concentrations in upper three inches of soil, the lower values indicate corresponding TDWR Leachate results. One Hundred percent of the final TDWR Leachate results and 99.6% (244 out of 245) of the total Pb concentration results met with the TDWR requirements. In most cases the final results were attained as an immediate result of the physical removal of the contaminated soil.

Every effort was made to decrease the probability that future action could be requested by the state, with respect to lead contamination. It is important to realize, however, that future remedial action is a possibility as regulations change and risk assessments are modified. It is believed the site has been cleaned to near background levels and meets state parameter within a 95+2% confidence level.

The Class I material was identified as lead contaminated soil with an EPA hazardous waste code of D008 in accordance with 40CFR 261.21-261.33. The material shipped ranged from 50-99% soil. Class I Pb concentrations ranged from 0.5-20%. The contaminated Class I soils were shipped in the following percentages:

<u>Soil Contaminant</u>	<u>%</u>
High Residual Pb Values	61
Battery Cases	13
Lead/Dross/Slag	10
Flue Dust, Lead Oxide	3
Dried Sludge	13

Class I material made up 67% of all materials shipped and Class II made up the balance; however, Class I attributed 89% of the cost.

All the Class II material removed was contaminated soils with total Pb concentration of less than .5% Pb (5,000 ppm).

The determining factor between Class I and Class II soils was the EPA - EP toxicity test (ref USEPA SW-846,1984) in accordance with 40 CFR 261.24 (max Pb Conc = 5.0 mg/l).

Every effort was made to prevent cross contamination or dilution. The material was stockpiled, shipped, analyzed and classified in accordance with the results. If the results were suspect, they were reanalyzed and/or resampled. If time allowed duplicate samples were sent to quality control laboratories. If uncertainties prevailed the material was shipped as Class I. No material was knowingly shipped to an improper facility and all known concentration of Class I and Class II materials were removed from the site.

Three laboratories were utilized throughout the cleanup program. The labs were SI, Southwest Research Institute (SwRI), and Raba-Kistner Consultation, Inc. (RK).

The SI laboratory was used for daily operational analysis of exploratory and confirmation samples, and stockpile total Pb

concentration. This was particularly helpful because of the 24-48 hour turnaround.

SwRI laboratory was the primary lab used to determine stockpile classification by EP Toxicity and to duplicate results for stockpile total Pb concentration. SwRI facilities were also used to analyze verification results by TDWR method and final total Pb concentration.

The RK lab was the quality control laboratory. Twenty percent of all samples analyzed were sent to the RK facility. In addition, each lab was instructed to duplicate a minimum of 20% of its results. Due to work time constraints and loads, it was a difficult order to meet, but each laboratory did its best to comply. Over all 10% of all samples were duplicated.

Each load of Class I material was accompanied with an EPA/TDWR Uniform Waste Manifest (see sample figure 3) and shipped to a TDWR approved hazardous waste landfill in Robstown, Texas, approximately 150 miles south of San Antonio, and operated by Texas Ecologists, Inc. (TECO). In total 1,465 truck loads of Class I material were shipped to TECO.

The Class I material was shipped to a commercial Type I landfill located approximately 13 miles from the Site and operated by Browning-Ferris, Inc. (BFI). Approval for BFI disposal was granted by both the TDWR and the Texas Department of Health (TDH). The TDH

is the principal governing agency for the BFI San Antonio facility. Each load was accompanied with a BFI manifest indicating total lead concentration and EP Toxicity results for respective stockpile (See sample manifest figure 4). In total 622 loads were shipped to BFI.

In summary, within a year, 53,718.54 tons of Class I and Class II were shipped to their appropriate landfills for proper disposal and the site cleanup was approved by the TDWR for full development without deed restriction or construction limitations.

3.0 TDWR NOTIFICATION

On or about April 4, 1984 the TDWR notified Gill Companies and SI that the IOP site was suspected to be contaminated with high concentrations of lead.

Discovery & Initial Sampling

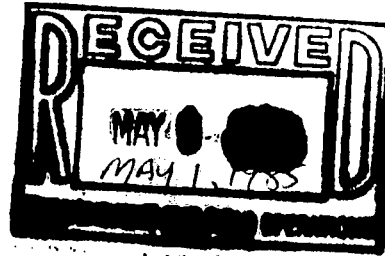
The potential for contamination was recognized by a Texas Air Control agent who recalled inspecting the SI facility when in full operation. The agent alerted the EPA which in turn notified the TDWR regional 8 office, in San Antonio. A field representative of the region 8 office collected 15 random soil samples and seven water samples from storm water standing from a recent storm. Five of the soil samples and all the water samples were collected on site. The ten remaining soil samples were collected within a 1 mile radius of

ATTACHMENT C

8434 Tuxford Dr.
San Antonio, Texas 78239
(512)655-8351

April 30, 1985

Mr. Robert W. Lee
Enforcement & Field Division
Texas Department of Water Resources
P.O. Box 13087
Capital Station
Austin, Texas 78711



Dear Mr. Lee:

I have been informed by the regional TDWR office that the results of the verification samples collected by you, Henry Karnei and myself at the Interchange Office Park site on February 8 & 14th, 1985 have been received. I realize from our discussions this morning that Mr. Karnei's report has not been received by your office. The final verification samples do indeed verify that the site has been decontaminated to levels which meet or exceed the TDWR parameters and confirm the results collected inhouse are representative of the site cleanliness.

The remedial effort took place from September 24, 1984 through March 6, 1985. During the course of the project 36,161.63 tons of Class I material were shipped to the TECO secure landfill in Robstown, Texas, and 17,494.37 tons of Class II material were shipped to the local BFI landfill. The final costs for the excavation, loading, transportation, and disposal of all the contaminated material was \$1,797,147.32. Actual haulage took place on 75 days within the project period.

As you know, constant liason was maintained with your office and that of the regional eight office to assure the TDWR was cognizant of the progress and problems encountered and the extreme care that was exercised to insure that the project was conscientiously and adequately performed. Every effort was made to remove all identified Class I and II material. No known areas of concentrated contamination has been left on site. No material was knowingly disposed of in an inappropriate facility and extreme care was exercised to prevent cross contamination or dilution.

Inhouse laboratory facilities were utilized only for identification of potential areas of contamination, and reconnaissance, or to prevent an interruption of the

Page 2
Final verification sampling
Interchange Office Park site
S.Forbes-4/30/85

of the project schedule. Primary classification of material to leave the site were based on analysis from an outside lab. Material that had lead concentrations of greater than or equal to 1% were automatically designated as Class I and no further analysis was performed. Material which had total lead concentrations of less than 1% but greater than or equal to 1000mg/kg were subjected to the EPT method to determine whether or not the material should be handled as Class I. Lead concentrations in the generated leachate of greater than or equal to 5mg/l were classified as Class I. Those that passed the test but either possessed lead concentrations of 2500mg/kg or 2.5mg/l in the leachate or better were designated as Class II special handling. The material that fell below these parameters but were above or equal to 1000mg/kg were designate as Class II no special handling. Material which passed all these criteria and the TDWR leachate method for lead(.05 mg/l) were allowed to remain in place as Class III.

Upon removal of all identified Class I and II material the entire grid system was resampled for verification sampling. Each grid point was analyzed by TDWR leachate method and for total lead, and each sample collected on a fifty foot grid subset were analyzed for total lead. Material was removed until the subset sample results were less than 1000mg/kg and then the grid point verification samples would be collected and analyzed. In the final analysis all 94 verification samples passed the total digested lead criterial by large margins as well as the TDWR leachate requirement. Twenty-five duplicate samples were collected and split with the TDWR(including one which had to be resampled) and all of which passed the same total digested lead and TDWR leachate requirements. It is these samples to which this letter originally referred and it is on the basis of all the verification sample results that I recommend that the site be ~~declared~~ clean and approved for full development without environmental restrictions (within the confines of the environmental regulations).

I realize that you require a detailed final report before the project can be completely signed off. The degree of detail for which you asked will be quite involved and time consuming. Therefore, as we have discussed, I am requesting a formal interim release to permit full site development, with the understanding that full release will be granted upon receipt by the TDWR of the final report, and contingent on their approval, the TDWR will confirm that the site has been cleaned to their satisfaction without constraints.

Page 3

Final verification sampling
Interchange Office Park site
S. Forbes-4/30/85

I believe that Gill Companies has acted in good faith, patience and resolve to assure the site is cleaned to the satisfaction of the state, and because of your conscientious and thorough project awareness I believe you appreciate the effort and extreme care which was exerted to assure the site was in fact clean- a fact which is supported by the verification samples.

I would appreciate your speedy response to this request and thankyou for your assistance and consideration.

Yours Truly,

A handwritten signature in black ink, appearing to read 'Stephen', followed by a long horizontal line that extends to the right and ends in a small upward tick.

Stephen Forbes